

Linda Joy Littlefield
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ATTORNEY FOR DEBTOR(S)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MIGUEL A CARDENAS	§	CASE NO. 16-33833
MARIA ALMA CARDENAS	§	
Debtors	§	CHAPTER 13
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20 CAP FUND I,LLC	§	
Movant	§	
	§	
VS.	§	
	§	
MIGUEL A CARDENAS	§	
MARIA ALMA CARDENAS	§	
Debtors	§	

DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM STAY

TO THE HONORABLE JUDGE OF THIS COURT:

COME NOW **Miguel A Cardenas** and **Maria Alma Cardenas**, Debtors in the above-styled and numbered cause, and in response to the Motion for Relief from Stay of **20 CAP FUND I,LLC**, ("Movant") in regard to the collateral referenced in Movant's motion.

Debtors respectfully show:

1. The allegations of **Movant** contained in paragraphs 1, 2, 3, 4, 5, 9, 10, 11, 12, 13, 14 and 15 of the motion are admitted.

2. The allegations of Movant contained in paragraphs 6, 7 and 8 of the motion do not require admission of denial. Debtors do not oppose the relief requested however they wish to have time to move due to Debtor's extreme health issues. Debtors wish to enter an agreement allowing them 90 days to move out.

WHEREFORE, PREMISES CONSIDERED, Debtors respectfully pray that Movant's Motion For Relief From Automatic Stay be denied and for such other and further relief as the Court may deem just and appropriate.

Dated: January 29, 2019.

Respectfully Submitted,

LITTLEFIELD LAW FIRM

/s/ Linda Joy Littlefield

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 29, 2019, a true and correct copy of the foregoing Response to Motion For Relief From Stay was served on the following parties in interest by first class mail or electronic notice:

CHAPTER 7 TRUSTEE

James W. Cunningham
Jim Cunningham & Associates, Inc.
6412 Sondra Dr.
Dallas, TX 75214-3451

U.S. TRUSTEE

William T. Neary
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Dallas, TX 75242

DEBTORS

Miguel A Cardenas
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OPPOSING COUNSEL

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By: /s/ Linda Joy Littlefield

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